



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue
Seattle, Washington 98101

April 12, 1993

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Reply To
Attn Of: HW-124

Mr. Dan Harelson
Environmental Restoration Division
U.S. Department of Energy
Idaho Operations Office
785 DOE Place
Idaho Falls, Idaho 83402

Re: Draft Track 2 Field Sampling Plan: Test Area North OU 1-04
and OU 1-05

Dear Mr. Harelson:

The enclosed comments regarding the above-referenced document are offered for your consideration.

The comments are in addition to those discussed at the conference call/meeting held April 9, 1993, wherein Table 1-4 was evaluated regarding the clarification of proposed analytical methods, source of analyses, and appropriateness of bottle blanks.

If you have any questions or comments, I may be contacted at 206/553-1752.

Sincerely,

Earl Liverman

Encl

cc: Margie English, IDHW

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10, SEATTLE, WASHINGTON

DRAFT TRACK 2 FIELD SAMPLING PLAN
TEST AREA NORTH OU 1-04 AND 1-05

GENERAL COMMENT

1. Revise the characterization of no further action sites and, as appropriate Track 2 sites, from "do not pose a risk" to "do not pose an unacceptable risk."

SPECIFIC COMMENTS

2. Section 1.1.1.1, page 1-5, paragraph 2
Resolve the inconsistency between the statement,
"No hazardous levels of metals are *suspected* in the buried wastes,"
and the following statement found on page A-4,
"No hazardous levels of metals were *found* in the stack or other disposed wastes."
3. Section 1.1.2, page 1-7

Revise to indicate that the Track 2 investigation of sites TSF-17, -20, -21, and WRRTF-04 does not require the removal of four underground storage tanks. Rather, the tanks will be removed incidental to the Tank Management Program.

(This comment also applies to Section 1.2.1.)
4. Section 1.1.2.1, page 1-9, paragraph 2

Describe the interface between the OU 1-04 and 1-05 SAP and the EG&G Idaho Tank Management Program.

As appropriate, pertinent procedures should be included as an appendix to the SAP.
5. Section 1.2.1, page 1-17, paragraph 1

Revise to indicate that the purpose of the investigation at sites TSF-17, -20, -21, and WRRTF-04 does not include confirmation of "clean closure."

6. Section 1.2.3, page 1-20

Revise the data needs table to relate field investigation tasks with specific sites. For example, geophysical surveys will be performed to detect buried wastes or subsurface metals at TSF-17, -26, and -29.

7. Section 1.2.4.1, page 1-22, paragraph 1

Revise to include the engineering survey described in Figure 1-8.

8. Section 1.2.4.1, page 1-23, paragraph 1

Clarify the following statement:

"If the contamination cannot be excavated and is above field screening levels of concern, the site will be investigated further before the end of the Track 2 field sampling phase."

9. Section 1.2.4.2, page 1-24, paragraph 1

Given existing site information, clarify why positive field screening for radioactive contaminants prompts sampling for metals.

10. Section 1.2.4.2, page 1-24, paragraph 2

Revise the discussion of analytical levels to include PCBs.

11. Table 1-3, page 1-25

Revise to identify the PCB screening concentration for 0 to 5 feet and 10 to 12 feet.

12. Table 1-4, page 1-26

Revise to include PCB analytical quality level and target detection limit, and VOC target detection limit.

13. Section 1.7.1, page 1-51, paragraph 1

A. Identify whether the investigation-derived waste will be treated/disposed of immediately or addressed with the final remedy.

B. Identify the CERCLA storage facility.

14. Section 1.7.1, page 1-51, paragraph 1

Identify the INEL water treatment unit and clarify the role of the unit. For example, will the unit treat all liquid wastes or only contaminated liquid wastes.

15. Appendix B, Section B-2

Revise to include procedures for PCB field screening and sampling.